Greetings

My name is Curtis Ardourel WA6UDS a licensed radio amateur and president of the Marin Amateur Radio Society. I am writing on behalf of the Marin Amateur Radio Society about MD Docket No. 20-270 Schedule of Application Fees.

While most of the schedule seems reasonable to us we strongly disagree with the $50 fee for Amateur Radio Licenses. There are several reasons for this.

1. The purpose of this rule change is to enable the FCC to recover costs associated with licensing. I would point out that Testing and Licensing for the Amateur Radio Service per Part 97.17 is provided by the American Radio Relay League (ARRL) which charges licensees a fee of $15.00. Since the administrative work is provided by the ARRL, it bears those costs and not the FCC. Amateurs should not be charged for the same work twice.

2. The Ray Baum Act provides for a methodology for adjusting the fee based on increased cost for the application activity over "current amount". We argue that based upon the application process, unique to the Amateur Radio Service by virtue of the administration process by ARRL, there is no current application fee to the FCC and no increased cost can be applied.

3. By law the Amateur Radio Service as provided in Part 97 (a) which states as one of the fundamental principles of the purpose of amateur radio is the "…Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications…" This fits in nicely with the spirit of the exemptions annunciated in the exception provisions the Baum Act (Section 8(d)), if not expressly as in Section 9. In addition to the reference to amateur radio as a "voluntary noncommercial service" quoted above, amateur radio is also non-profit as a matter of law pursuant to Part 97.113. Many arguments can be made here for the service that amateur radio actually provides in the event of emergencies or disasters as we have seen on the Gulf Coast the past few years.

4. Part of our club mission is to train new people to become Amateur Radio Licensees. We devote considerable time to the explanation of which activities are permitted and which proscribed by part 97. There is no legal avenue for an Amateur Radio operator to gain financially from the use of the Amateur Radio Service. Since the service is entirely

volunteer it seems contradictory to the definition of the service to add a new not insignificant fee to an individual who can in no way recoup the cost.

Thank you for your consideration in the matter.

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